

Exhibit 1

ALLEN LIPPOLDT
GODFREY vs CSAA

December 30, 2019

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1	A P P E A R A N C E S	1	S T I P U L A T I O N S
2	FOR THE PLAINTIFFS:	2	
3	KEITH F. GIVENS	3	It is hereby stipulated and agreed by and
4	Attorney at Law	4	between the parties hereto, through their respective
5	MANSELL, ENGEL & COLE	5	attorneys, that the videotaped deposition of ALLEN
6	204 North Robinson Avenue, 21st Floor	6	LIPPOLDT may be taken on behalf of the Defendant on
7	Oklahoma City, Oklahoma 73102-7001	7	December 30, 2019, in Oklahoma City, Oklahoma, by
8	kgivens@meclaw.net	8	Kasey D. Egelston, Certified Shorthand Reporter
9	FOR THE DEFENDANT:	9	within and for the State of Oklahoma, pursuant to
10	BRUCE ROBERTSON	10	the Federal Rules of Civil Agreement.
11	Attorney at Law	11	
12	RYAN, WHALEY	12	*****
13	400 North Walnut	13	
14	Oklahoma City, Oklahoma 73104	14	
15	brobertson@ryanwhaley.com	15	
16	ALSO PRESENT:	16	
17	Bruce Rodgers, Videographer	17	
18		18	
19		19	
20		20	
21		21	
22		22	
23		23	
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25		25	

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<p style="text-align: right;">Page 41</p> <p>1 minimal slopes, and we had the 2009 building code</p> <p>2 and we did not have the regulations we have now</p> <p>3 enforcing some of this stuff prior to --</p> <p>4 Q Enforcing the change in the design aspect</p> <p>5 of it?</p> <p>6 A Well, enforcing compliance of roofing</p> <p>7 contractors in the state to follow the building</p> <p>8 codes. So what was common every day roofing</p> <p>9 practices that were accepted changed after the</p> <p>10 Construction Industries Board forced registration</p> <p>11 and compliance and weeded out some of the</p> <p>12 contractors that were installing roofs poorly.</p> <p>13 Q Okay. What changed as far as -- what used</p> <p>14 to happen that doesn't happen now?</p> <p>15 A As far as the installation or the workers</p> <p>16 doing it?</p> <p>17 Q Well, whatever the International Building</p> <p>18 Code or construction processes you were talking</p> <p>19 about -- the change in 2015.</p> <p>20 A So the biggest thing is the awareness for</p> <p>21 the contractors.</p> <p>22 Q Awareness of what?</p> <p>23 A Of the building code SP followed.</p> <p>24 Q Okay. Is the building code mainly dealing</p> <p>25 with the slope for what?</p>	<p style="text-align: right;">Page 43</p> <p>1 commercial.</p> <p>2 Q Currently, you're not registered?</p> <p>3 A No. I used to be registered.</p> <p>4 Q Okay.</p> <p>5 A Personally for residential.</p> <p>6 Q When were you registered for residential,</p> <p>7 Mr. Lippoldt?</p> <p>8 A I would have to look on -- I don't know if</p> <p>9 it would still show on the Construction Industries</p> <p>10 Board website, but it's, I think, 2015-ish --</p> <p>11 Q Okay.</p> <p>12 A -- that I was registered.</p> <p>13 Q Were you just registered for a year?</p> <p>14 A Yeah.</p> <p>15 Q Is it yearly?</p> <p>16 A It's a yearly. I was registered up until</p> <p>17 November -- I know I got out of caring about all of</p> <p>18 that November of 2016. I think I let whatever I had</p> <p>19 lapse, but I had -- I previously was registered to</p> <p>20 do residential.</p> <p>21 Q So you indicated originally that you worked</p> <p>22 with registered or for registered companies?</p> <p>23 A Uh-huh.</p> <p>24 Q And who were those? Is that the ones you</p> <p>25 already named?</p>
<p style="text-align: right;">Page 42</p> <p>1 A It is -- rephrase that.</p> <p>2 Q Okay.</p> <p>3 A I mean, there's a bunch of aspects, but one</p> <p>4 of the main things is having a tapered roof system</p> <p>5 so that it drains appropriately. It's been code,</p> <p>6 however, the regulation from the Construction</p> <p>7 Industries Board, enforcing contractors to be</p> <p>8 regulated has weeded out some of the contractors</p> <p>9 that were just trying to throw up something on a</p> <p>10 roof and get paid. So we have better installers</p> <p>11 following building codes, which is better</p> <p>12 documented.</p> <p>13 Q Are you licensed?</p> <p>14 A I'm not.</p> <p>15 Q Okay. Is there a licensing for</p> <p>16 contractors?</p> <p>17 A There is a registration for residential and</p> <p>18 there's a registration for commercial.</p> <p>19 Q Okay. Are you registered?</p> <p>20 A I worked at the registry company that was</p> <p>21 both commercially endorsed.</p> <p>22 Q Did you say you worked at a registry</p> <p>23 company?</p> <p>24 A I worked with -- under -- the company doing</p> <p>25 work was registered both for residential and</p>	<p style="text-align: right;">Page 44</p> <p>1 A Ultimate Roofing Construction was</p> <p>2 registered for both residential and commercial and</p> <p>3 then I had my license.</p> <p>4 MR. ROBERTSON: All right. We've been</p> <p>5 going over an hour. Why don't we take a five-minute</p> <p>6 break.</p> <p>7 THE VIDEOGRAPHER: Off the record.</p> <p>8 (Break was had from 10:03 to 10:13)</p> <p>9 THE VIDEOGRAPHER: Back on.</p> <p>10 Q (By Mr. Robertson) Mr. Lippoldt, we've</p> <p>11 taken a break and kind of stretched our legs a</p> <p>12 little bit. Do you understand you are still under</p> <p>13 oath?</p> <p>14 A Yes.</p> <p>15 Q Have you had any type of specific seminars</p> <p>16 on flat roofing at all?</p> <p>17 A No.</p> <p>18 Q Have you been charged with any crimes at</p> <p>19 any time?</p> <p>20 A Yes.</p> <p>21 Q Tell me about that.</p> <p>22 A 2002, 2:02 a.m., got pulled over.</p> <p>23 Marijuana in my car.</p> <p>24 Q Okay.</p> <p>25 A And I escaped custody.</p>

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1 Q What does that mean?

2 A They put me in a police car.

3 Q Yeah.

4 A And I got out of the police car and fled.

5 Q Did they put you in the police car with

6 handcuffs?

7 A No.

8 Q I was going to say that would be a trick.

9 Did you end up with a conviction as far as a result

10 of that?

11 A Yeah. I don't recall what they are.

12 There's four felonies. One of them, I think, was

13 something to do with fleeing. One of them was CDS

14 with intent to distribute.

15 Q Was it marijuana?

16 A Yeah. And it's still a public record.

17 Q Did you have to serve any time?

18 A I don't -- I didn't.

19 Q Did you get a suspended sentence?

20 A Yes.

21 Q Any others?

22 A No, that I recall. That was the last time

23 I got arrested. I got arrested as a minor.

24 Q What was that for?

25 A I think for mooning somebody.

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1 Q For what? Manning somebody?

2 A Mooning.

3 Q Mooning.

4 A From inside of the house I put my butt to

5 the window. In 2002 was the last time I was ever in

6 trouble.

7 Q Okay. Good.

8 A I think I was 18 or 19.

9 Q On your phone system, does it type out or

10 can it type out or was it able to type out?

11 A There was an app that I used for a few

12 weeks or a few months. I think it was, like, Otter

13 or something to that nature.

14 Q Audit?

15 A Otter. And it would transcribe phone

16 calls.

17 Q What do you recall about -- as we sit here,

18 what do you recall about the outcome of the

19 Godfrey's roof?

20 A I don't know what ever happened with it.

21 The last thing -- I don't remember when I sent this,

22 but I definitely remember this document. I don't

23 know if I sent it directly to Mark Engel's office or

24 to Russ Godfrey to forward or whatever, but this is

25 kind of the end of what I remember. (Indicating.)

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1 Q Okay.

2 A But as far as the experience, the last

3 thing I remember is that the adjuster that was out

4 there had agreed with the production or sales guy

5 from Ultimate Roofing that there was some damage and

6 that had changed. Like what he wrote up to be

7 repaired and replaced that was damaged and was

8 changed.

9 Q Do you have any training or dealings with

10 insurance policies?

11 A Yeah.

12 Q What training have you had with regard to

13 insurance policies?

14 A Minimum, to get a public adjuster's

15 license.

16 Q Are you a public adjuster?

17 A Not any more.

18 Q When did you have your public adjuster's

19 license?

20 A I think in 2018, towards the end. No, it

21 was sometime in 2018. I only did one contract -- or

22 two different properties with one client, as a

23 public adjuster.

24 Q What was your job as a public adjuster?

25 A It was two commercial buildings.

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1 Q Okay. What did you do on those?

2 A The same thing I do on any estimate or

3 building plan.

4 Q What is a public adjuster?

5 A Somebody who represents an insured to make

6 sure that their policy is covering what it's

7 supposed to. And that's basically it.

8 Q Were you a public adjuster at the time

9 you --

10 A I don't think I was.

11 Q -- dealt with the Godfrey home?

12 A I don't think I was.

13 Q Did you work for a public adjusting

14 company?

15 A No.

16 Q Did you just do it yourself?

17 A Yeah. I had my license.

18 Q For how long?

19 A I -- for the year. I don't remember when I

20 got it exactly, but I think it would be in the file

21 somewhere.

22 Q What type of -- do you have to take a test

23 to become a public adjuster?

24 A Uh-huh.

25 Q Yes?